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Public Comments to DOE OCRWM at Reston VA "Workshop" on Nuclear Transport 8/13/97

NIRS would like to go on "record" with the following Public Comment to the Department of Energy Office of Civilian Radioactive Waste Management about the its so-called "workshops" on nuclear waste transportation August 7-8, 1997 in Dallas TX and August 12-13, 1997 Reston VA.

By neither effectively notifying the public nor providing assistance to members of the public to attend the vague workshops on nuclear waste transportation, the DOE, under the guise of "public participation," is apparently using these taxpayer-funded gatherings to brief and work with potential contractors to carry out future transportation contracts. This is evidenced by the participant list which is heavily stacked with contractors. Such interactions are in no way representative of the public or public concerns. The public demands meaningful interactions, good faith notification in advance and some semblance of the real purpose for meetings and workshops.

NIRS is actively involved in the many issues related to nuclear waste and transport and we work with and represent thousands who have participated at various levels in the ongoing debates and decision-making. Had there been adequate notice and genuine interest in hearing from the public, we could have alerted many participants who truly represent the concerned public. We had intended to participate, despite the short notice and vagueness of agenda and purpose, but believe that the 3 to 5 minute opportunity for the "public" to give input to the "record" was inadequate.

DOE in no way represented the American public in contracts made with nuclear utilities to take irradiated fuel from the commercial nuclear plants after the 1982 Nuclear Waste Policy Act. Now DOE appears to be testing the waters and plunging ahead into more contracts (for unnecessary, risky, expensive shipment of irradiated fuel) of which the public likely will not approve. Setting up "public workshops" that effectively exclude meaningful participation and criticism dangerously shield the department from important realities with which it will eventually have to contend.

NIRS strongly advises DOE to assess the full range of "solutions" to the nuclear waste transportation problem including an honest evaluation of the need or lack of need for shipments. Among the issues that we recommend DOE consider and provide answers, *before any contracts are considered* are: cessation of waste production, the involuntary radiation risks to uninformed, unconsenting members of the public under routine and accident conditions, liabilities borne by local communities for personal and property damages for both routine and accidental contamination (Insurance policies expressly exempt nuclear accidents from coverage.), realistic protection for both professional and volunteer emergency responders, long term costs and capabilities for supplying and sustaining emergency equipment and training *all along all routes*, long-term health care costs to routinely and accidentally exposed individuals and communities, synergistic effects with other poisons in the environment and on the transport routes, monitoring.

cc: Representative Richard Gephardt

